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11 Attorneys for Defendant
12 FIDELITY NATIONAL TITLE INSURANCE COMPANY

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 WILMINGTON SAVINGS FUND
16 SOCIETY, FSB DBA CHRISTIANA TRUST
17 AS TRUSTEE FOR HLSS MORTGAGE
18 MASTER TRUST FOR THE BENEFIT OF
19 THE HOLDERS OF THE SERIES 2014-1
20 CERTIFICATES ISSUED BY HLSS
21 MORTGAGE MASTER TRUST

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE
25 INSURANCE COMPANY,

26 Defendant.

27 Case No.: 2:19-cv-00959-JCM-VCF

28 **STIPULATION AND PROPOSED
29 ORDER EXTENDING DEFENDANT
30 FIDELITY NATIONAL TITLE
31 INSURANCE COMPANY'S TIME TO
32 RESPOND TO COMPLAINT**

33 **(First Request)**

34 Plaintiff Wilmington Savings Fund Society, FSB DBA Christiana Trust As Trustee for
35 HLSS Mortgage Benefit of the Holders of the Series 2014-1 Certificates Issued by HLSS
36 Mortgage Master Trust, ("Wilmington") and Defendant Fidelity National Title Insurance
37 Company ("Fidelity"), by and through their counsel of record, hereby stipulate as follows:

38 **WHEREAS**, Wilmington filed its complaint in this matter on June 5, 2019 (ECF No. 1);

39 **WHEREAS**, Fidelity was served with the summons and complaint on or about September
40 3, 2019;

41 **WHEREAS**, Fidelity's response to the complaint is due September 24, 2019;

42 **WHEREAS**, Wilmington has agreed to extend Fidelity's time to respond to the complaint
43 to October 8, 2019; and

1 **WHEREAS**, this is the first stipulation for an extension of Fidelity's time to respond to
2 the complaint.

3 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate
4 and agree as follows:

- 5 1. Fidelity shall file its response to the complaint on or before October 8, 2019.

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1 2. Fidelity intends to preserve its right and does not expressly waive any and all defenses
2 listed in Fed. R. Civ. P. 12(b), including with respect to whether it is subject to
3 personal jurisdiction in this forum.

4 Dated this 24th day of September 2019

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

6 */s/--Kevin S. Sinclair*

7 By: _____
8 Kevin S. Sinclair, Esq.
9 Nevada Bar No. 12277
10 Sophia S. Lau, Esq.
11 Nevada Bar No. 13365
12 8716 Spanish Ridge Avenue, Suite 105
13 Las Vegas, Nevada 89148

10 Attorneys for Fidelity National Title Insurance
11 Company

12 Dated this 24th day of September 2019

WRIGHT, FINLAY & ZAK, LLP

13 */s/--Lindsay D. Robbins*

14 By: _____
15 Matthew S. Carter, Esq.
16 Nevada Bar No. 9524
17 Lindsay D. Robbins, Esq.
18 Nevada Bar No. 13474
19 7785 W. Sahara Ave., Suite 200
20 Las Vegas, NV 89117

21 Wilmington Savings Fund Society, FSB DBA
22 Christiana Trust As Trustee for HLSS Mortgage
23 Benefit of the Holders of the Series 2014-1 Certificates
24 Issued by HLSS Mortgage Master Trust

25 **ORDER**

26 **IT IS SO ORDERED:**

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28 By: _____

29 Cam Ferenbach
30 UNITED STATES MAGISTRATE JUDGE
31 September 25, 2019

32 Dated: _____